

THE LAW OFFICES OF**NATHANIEL Z. MARMUR, PLLC**

500 FIFTH AVENUE, 40TH FLOOR, NEW YORK, NY 10110

T: 212-257-4894 F: 646-829-9519

NMARMUR@MARMURLAW.COM

WWW.MARMURLAW.COM

May 12, 2020

VIA ECF

The Honorable Katherine Polk Failla
United States Courthouse
40 Foley Square, Courtroom 618
New York, NY 10007

Re: United States v. Dimitriou, 1:19-cr-00894-KPF-1

Dear Judge Failla,

I represent Jerry Dimitriou and I write to ask the Court for permission to modify the conditions of his pre-trial release (i) to allow him to travel to Christiana, Pennsylvania, this Saturday to pick up a new family dog and (ii) to allow travel to the District of New Jersey for purposes of employment.

As to the second request, before his arrest, Mr. Dimitriou was working as a consultant for Merritt Construction Services Inc. in Stamford. As such, his pre-trial release conditions include a provision allowing him to travel to Connecticut for employment purposes in the hope that he could continue to work on projects there. With the easing of certain COVID-19 restrictions as they relate to construction, Merritt is now seeking public infrastructure projects and a private project that require meetings in New Jersey that Mr. Dimitriou would be expected to attend. Hence, we ask that his allowed travel be expanded to include New Jersey.

Mr. Dimitriou is being monitored by Pretrial Services in the Eastern District of New York, and his officer, Mallori Brady, informs me that he has been compliant with the terms of his release and that she has no objection to the request. She has also asked for the Southern District's position because it has primary jurisdiction over Mr. Dimitriou, and that office has confirmed that it, too, has no objection. Finally, AUSA Michael McGinnis has informed me that the government consents to this request.

I thank you in advance for your attention to this matter.

Respectfully submitted,

/s/ Nathaniel Z. Marmur

Nathaniel Z. Marmur

Application GRANTED.

Dated: May 13, 2020
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE